ROBERT E. ATKINSON, ESQ., Bar No. 9958 1 Email: robert@nv-lawfirm.com 2 ATKINSON LAW ASSOCIATES LTD. 376 E Warm Springs Rd, Suite 130 3 Las Vegas, NV 89119 Telephone: (702) 614-0600 4 Attorney for Christopher P. Burke, Trustee 5 UNITED STATES BANKRUPTCY COURT 6 DISTRICT OF NEVADA 7 Case No.: 24-50132-hlb In re: Chapter 7 8 CAREER COLLEGES, INC., 9 MOTION TO ABANDON SECURED PROPERTY Debtor. 10 [LR 9014.1 Negative Notice Procedures] 11 12 TO: ALL PARTIES IN INTEREST and THEIR COUNSEL OF RECORD: 13 NOTICE OF OPPORTUNITY TO OBJECT AND SET FOR HEARING 14 Pursuant to LR 9014.1, the court will consider this motion, objection, or other matter without 15 further notice of hearing unless a party in interest files an objection within twenty-one (21) 16 days from the date of service of this paper. If you object to the relief requested in this paper, you may file your objection at the bankruptcy clerk's office located in Las Vegas at the 17 United States Bankruptcy Court, 300 Las Vegas Blvd. South, Las Vegas, Nevada 89101, or in Reno at the United States Bankruptcy Court, 300 Booth Street, Reno, NV 89509, and serve a 18 copy on the movant and any other appropriate persons. 19 It is the duty of the objecting party to timely set the objection for a hearing and properly 20 notice all parties in interest. If you do not file an objection within the time permitted, an order granting the requested relief may be entered by the court without further notice 21 or hearing. 22 Chapter 7 trustee Christopher P. Burke ("Trustee") hereby moves to abandon the following 23 property of the estate, which is secured collateral of creditor Tuition Options LLC (the "Secured 24 **Property**"): 2.5 All retail installment contracts ("RICs") of the Debtor, including all electronic 26 records thereof. 27 Per Court order [ECF #74], the Trustee is required to file this motion.

Section 554(a) of the Bankruptcy Code provides, "after notice and a hearing, the trustee may abandon any property of the estate that is burdensome to the estate or that is of inconsequential value and benefit to the estate." 11 U.S.C. § 554(a). Satisfying either prong of Section 554(a) is sufficient to grant abandonment relief.

In this matter, the Trustee asserts that the Secured Property is of inconsequential value and benefit to the bankruptcy estate for the following reason:

• Because this is secured collateral, no equity exists in the Secured Property to liquidate for the benefit of the estate.

Because at least one prong of Section 554(a) is satisfied, the Trustee asserts that cause exists to abandon the Property.

Bankruptcy Rule 6007 provides that a trustee may give notice of a proposed abandonment of property and seek Court review and approval, subject to the right of a party-in-interest to object. Fed. R. Bank. Pr. 6007(a). Therefore, the Trustee requests the Court's approval to abandon the Secured Property.

Local Bankruptcy Rule 9014.1(a)(4) provides for negative notice procedures. Pursuant to that rule, the Trustee hereby gives notice of the proposed abandonment. Pursuant to LR 9014.1(b), the proposed order is attached as Exhibit 1.

WHEREFORE, the Trustee hereby gives notice of his intent to abandon the Property, and requests that the Court approve this abandonment.

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DATED: December 31, 2024 ATKINSON LAW ASSOCIATES LTD.

By: /s/ Robert Atkinson

ROBERT E. ATKINSON, ESQ.

Nevada Bar No. 9958

Attorney for Trustee

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EXHIBIT 1 [Proposed Order]

1 2 3 4 5 6 7 ROBERT E. ATKINSON 8 CHAPTER 7 BANKRUPTCY TRUSTEE 376 E. Warm Springs Rd Suite 130 9 Las Vegas, NV 89119 Telephone: (702) 617-3200 10 Email: Robert@ch7.vegas 11 UNITED STATES BANKRUPTCY COURT 12 FOR THE DISTRICT OF NEVADA 13 In re: Case No. 24-50132-hlb 14 Chapter 7 CAREER COLLEGES, INC. 15 ORDER GRANTING MOTION TO 16 Debtor. ABANDON SECURED PROPERTY 17 18 The Court reviewed and considered the chapter 7 trustee's motion entitled MOTION TO 19 ABANDON SECURED PROPERTY [ECF #] (the "*Motion*"). No objection or opposition to the Motion was timely filed. For the reasons stated in the 20 Motion, good cause appears to grant the requested relief. 21 IT IS HEREBY ORDERED: 22 23 1. The Motion is approved. 2. The following property is hereby abandoned, and is no longer property of the 24 25 bankruptcy estate as of the date of entry of this order: All retail installment contracts ("RICs") of the Debtor, including all 26 electronic records thereof. 27 IT IS SO ORDERED. 28

reflects the court's ruling and that (check one): The court has waived the requirements set forth in LR 9021(b)(1). No other party appeared at the hearing or filed an objection to the motion. I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below: I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order. ####	1	# # #
ROBERT E. ATKINSON Chapter 7 Trustee CERTIFICATION re: RULE 9021 In accordance with LR 9021, counsel submitting this document certifies that the order accuratel reflects the court's ruling and that (check one): The court has waived the requirements set forth in LR 9021(b)(1). No other party appeared at the hearing or filed an objection to the motion. I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below: I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order. ### ###	2	Respectfully submitted by:
In accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one): The court has waived the requirements set forth in LR 9021(b)(1). No other party appeared at the hearing or filed an objection to the motion. I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below: I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order. ####	4	ROBERT E. ATKINSON
In accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one): The court has waived the requirements set forth in LR 9021(b)(1). No other party appeared at the hearing or filed an objection to the motion. I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below: I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order. ####		CERTIFICATION re: RULE 9021
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